

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GUCCI AMERICA, INC., BALENCIAGA)
AMERICA, INC., BALENCIAGA S.A.,)
BOTTEGA VENETA INTERNATIONAL)
S.A.R.L., BOTTEGA VENETA, INC., LUXURY)
GOODS INTERNATIONAL (L.G.I.) S.A. and) No. 10 Civ. 4974
YVES SAINT LAURENT AMERICA, INC.,)
Plaintiffs,)
v.)
WEIXING LI and LIJUN XU a/k/a JACK)
LONDON, all doing business as REDTAGPARTY,)
MYLUXURYBAGS.COM,)
XPRESSDESIGNERS.COM,)
XPRESSDESIGNER.NET, and DESIGNER)
HANDBAGS; ABC COMPANIES; and JOHN)
DOES,

NOTICE OF
CROSS MOTION

Defendants.

PLEASE TAKE NOTICE that upon the annexed Declaration of Dwight A. Healy, dated December 22, 2010, Declaration of Zhipan Wu, dated December 22, 2010 and the Declaration of John Beauchemin, dated December 21 , 2010, Third Party Bank of China, by its undersigned attorneys, will move this Court before the Honorable Richard J. Sullivan, United States District Judge, in Courtroom 21C of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on Wednesday, January 5, 2011 at 12:00 p.m., pursuant to the terms of the Court's Preliminary Injunction and Order Authorizing Expedited Discovery, dated July 13, 2010 ("Preliminary Injunction"), for an order (i) modifying Plaintiffs' Preliminary Injunction to state that it does not apply to assets of Defendant held by Bank of China outside of

New York; and (ii) awarding Third Party Bank of China such other and further relief as the Court may deem just and proper.

Dated: December 22, 2010
New York, New York

WHITE & CASE LLP

By: /s/ Dwight A. Healy

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